

Exhibit A

PLAINTIFFS' WITNESS LIST**EXPECT TO CALL****1. Expert Witnesses**

Name of Witness	Expected Testimony
Dr. Jonathan Rodden	Dr. Jonathan Rodden has been designated as an expert witness and will testify about the matters addressed in his expert reports.
Dr. Lorraine Minnite	Dr. Lorraine Minnite has been designated as an expert witness and will testify about the matters addressed in her expert reports.
Dr. Allan Lichtman	Dr. Allan Lichtman has been designated as an expert witness and will testify about the matters addressed in his expert reports.
Dr. John Douglas Smith	Dr. John Douglas Smith has been designated as an expert witness and will testify about the matters addressed in his expert reports.

2. Fact Witnesses

Name of Witness	Expected Testimony
Gonzalo Aida	Gonzalo Aida is a named plaintiff, lawfully registered Virginia voter, organizer, and activist who will testify about the ways in which the Virginia photographic identification law has caused him injury, including specifically with regard to his Virginia voter education, outreach and turnout efforts.
Barbara Lee	Barbara Lee is a named plaintiff, lawfully registered Virginia voter, organizer, and activist who will testify about the ways in which the Virginia photographic identification law has caused her injury, including specifically with regard to her Virginia voter education, outreach and turnout efforts.
Rebecca Slutzky	Rebecca Slutzky is the Executive Director of the Democratic Party of Virginia ("DPVA"), a

	named plaintiff. She will testify about the impact of Virginia's photographic identification law on the DPVA and Democratic voters.
Anthony Pfohl	Anthony Pfohl is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Bobbie Smith II	Bobbie Smith II is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Jack Etheredge	Jack Etheredge is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Jennifer Tidd	Jennifer Tidd is a lawfully registered Virginia voter who will testify from personal knowledge about the ways in which the Virginia photographic identification law has burdened her son's right to vote.
Josephine Okiakpe	Josephine Okiakpe is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Marietta Cheeks	Marietta Cheeks is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Megan Cotten	Megan Cotten is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Pettus Hilt	Pettus Hilt is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law

	has burdened his right to vote.
Stephen Jackson	Stephen Jackson is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Abraham “Abe” Barranca	Abraham Barranca is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Amanda John	Amanda John is a former lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
James Abys-Smith	James Abys-Smith is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Karen Stallings	Karen Stallings is a lawfully registered Virginia voter who will testify from personal knowledge about the ways in which the Virginia photographic identification law has burdened her father’s right to vote.
Kenneth Adams	Kenneth Adams is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Beverly Person	Beverly Person is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Ellen Lamb	Ellen Lamb is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law

	has burdened her right to vote.
James Pitts	James Pitts is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Laning Polatty	Laning Polatty is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
Shanna Samson	Shanna Samson is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Senator Scott Surovell	Senator Surovell is a senator in the Virginia State Senate. He will testify about the Virginia General Assembly's consideration and passage of voter identification laws, including SB 1256, as well as the impact of the Virginia photo identification law on his constituency and community.
Delegate Alfonso Lopez	Delegate Lopez is a delegate in the Virginia House of Delegates. He will testify about the Virginia General Assembly's consideration and passage of voter identification laws, including SB 1256, as well as the impact of the Virginia photo identification law on his constituency and community.
Delegate Algie Howell	Delegate Howell is a delegate in the Virginia House of Delegates. He will testify about the Virginia General Assembly's consideration and passage of voter identification laws, including SB 1256, as well as the impact of the Virginia photo identification law on his constituency and community.
Delegate Jennifer McClellan	Delegate McClellan is a delegate in the Virginia House of Delegates. She will testify about the Virginia General Assembly's consideration and passage of voter identification laws, including SB 1256, as well

	as the impact of the Virginia photo identification law on her constituency and community.
Susan Kellom	Susan Kellom is a member of the Alexandria Electoral Board. She will testify about the implementation of Virginia's photographic identification law in her jurisdiction.
Keith Scarborough	Keith Scarborough is a member of the Prince William County Electoral Board. He will testify about the implementation of Virginia's photographic identification law in his jurisdiction.
Cathy Woodson	Cathy Woodson is Second Vice Chair of the Henrico County Democrats and an organizer who will testify about voter education efforts related to Virginia's photographic identification law in the communities in which she typically works.
Cheryl Zando	Cheryl Zando is Chair of the Henrico County Democrats and an organizer who will testify about voter education efforts related to Virginia's photographic identification law in the communities in which she typically works.
Jeff Allen	Jeff Allen is an organizer who will testify about voter education efforts related to Virginia's photographic identification law in the communities in which he typically works.

WILL PRESENT BY VIDEO

1. Fact Witnesses

Name of Witness	Expected Testimony
Mary Jones	Mary Jones is a lawfully registered Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Charles Benagh	Charles Benagh is a lawfully registered

	Virginia voter who will testify about the ways in which the Virginia photographic identification law has burdened his right to vote.
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MAY CALL

1. Expert Witnesses

Name of Witness	Expected Testimony
Yair Ghitza	Yair Ghitza has been designated as an expert witness and may testify about the matters addressed in his expert report.

2. Fact Witnesses

Name of Witness	Expected Testimony
Elisa Chang	Elisa Chang is a lawfully registered Virginia voter who may testify about the ways in which the Virginia photographic identification law has burdened her right to vote.
Juanita Santos	Juanita Santos is a lawfully registered Virginia voter who may testify about the ways in which the Virginia voter identification law has burdened her right to vote.
Carroll Williams	Carroll Williams is a member of the Montgomery County Electoral Board. She may testify about the implementation of Virginia's photographic identification law in her jurisdiction.
Seth Stark	Seth Stark is a member of the Fairfax County Electoral Board. He may testify about the implementation of Virginia's photographic identification law in his jurisdiction.
Frank Leone	Frank Leone is an organizer who may testify about voter education efforts related to Virginia's photographic identification law.

Jenny Glass	Jenny Glass is an organizer who may testify about voter education efforts related to Virginia's photographic identification law.
Georgina Cannan	Georgina Cannan is the Voter Protection & Policy Director of the DPVA. She may testify about the impact of Virginia's photographic identification law on the DPVA and Democratic voters.
Edgardo Cortés	Edgardo Cortés is the Commissioner of the Virginia Department of Elections. He may testify about matters discussed in his deposition, as well as the administration of elections in Virginia, including the implementation and effect of Virginia's recent voter identification laws.
Nikki Sheridan	Nikki Sheridan is the former Confidential Policy Advisor for the Virginia State Board of Elections. She may testify about matters discussed in her deposition, as well as the administration of elections in Virginia, including the implementation and effect of Virginia's recent voter identification laws.
Myron McClees	Myron McClees is a Policy Advisor for the Virginia Department of Elections. He may testify about matters discussed in his deposition, as well as the administration of elections in Virginia, including the implementation and effect of Virginia's recent voter identification laws.
Sheri Vaughan / DMV Rule 30(b)(6) witness	Sheri Vaughan is the program manager for Customer Service Management Administration at the Virginia Department of Motor Vehicles. She may testify about matters discussed in the deposition at which she represented the DMV.
David Pierce / DMV Rule 30(b)(6) witness	David Pierce is the Director of Data Management Services at the Virginia Department of Motor Vehicles. He may testify about matters discussed in the deposition at which he represented the DMV.
Virginia State Board of Elections Rule	The witness may testify about matters

30(b)(6) witness	discussed in the deposition at which he or she represented the State Board of Elections, as well as the administration of elections in Virginia, including the implementation and effect of Virginia's recent voter identification laws.
Jeffrey Caldwell	Jeffrey Caldwell was the Press Secretary for Governor Bob McDonnell. He may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from the Governor's Office.
Robert Bailie	Robert Bailie is the co-founder of the Middle Resolution PAC. He may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from members of the General Assembly
Paul Haughton	Paul Haughton is the former Executive Director of the House Republican Campaign Committee of Virginia. He may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from members of the General Assembly.
Lisa Hicks-Thomas	Lisa Hicks-Thomas is the former Secretary of Administration for the Commonwealth of Virginia. She may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from the Governor's Office.
John Kwapisz	John Kwapisz is the Legislative Director of the Virginia Voters Alliance. He may testify about the passage of Virginia's recent voter identification laws, including the intent and

	anticipated effect of those laws and contemporaneous communications about those laws to and from members of the General Assembly.
John Tucker Martin	John Tucker Martin was the Director of Communications for Governor Bob McDonnell. He may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from the Governor's Office.
Julia Hammond	Julia Hammond was the Director of Legislative Affairs and Policy Advisor for Governor Bob McDonnell. She may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from the Governor's Office.
Jacob Jasen Eige	Jacob Jasen Eige was a Counselor and Senior Policy Advisor for Governor Bob McDonnell. He may testify about the passage of Virginia's recent voter identification laws, including the intent and anticipated effect of those laws and contemporaneous communications about those laws to and from the Governor's Office.
Kim Steinhoff / Records Custodian for Office of the Governor of Virginia	Kim Steinhoff is the current Records Custodian for the Office of the Governor. She may testify about records created and maintained in the ordinary course of business by the Office of the Governor.
Glenn Smith / Records Custodian for the Library of Virginia	Glenn Smith is the current Records Management Analyst for the Library of Virginia. He may testify about records created and maintained in the ordinary course of business by the Office of the Governor.